To: Musser, Cynthia J[Cynthia.J.Musser@wv.gov]

From: Linden, melissa

Sent: Thur 2/20/2014 1:27:47 PM

Subject: RE: HOTSITE REPORT: Update - Freedom Industries, Charleston, WV

Okay, thank you. During yesterdays 10:30am meeting I was able to get more of the details about how much waste water, confirmed where it was going and that they were going to proceed with solidification. So, those were the questions that I had.

Melissa

From: Musser, Cynthia J [mailto:Cynthia.J.Musser@wv.gov]

Sent: Wednesday, February 19, 2014 9:34 PM

To: Linden, melissa

Subject: Re: HOTSITE REPORT: Update - Freedom Industries, Charleston, WV

Melissa

I still have not been able to obtain a copy the approval letter, request, or supporting documentation from our permitting folks for disposal of water at DSI although I have been told it was approved.

Cindy

On Feb 19, 2014, at 8:36 PM, "Linden, melissa" < linden.melissa@epa.gov > wrote:

From: Burns, Francis

Sent: Wednesday, February 19, 2014 2:54 PM

To: R3 HOTSITES

Subject: HOTSITE REPORT: Update - Freedom Industries, Charleston, WV

OSC Melissa Linden reported that water pumping operations continued in the containment area of the tanks storing the pumped water, in all of the sumps inside the containment area surrounding the MCHM tanks, in the interceptor trench, and in the loading dock area, which leads to the oil/water separator. The loading dock

area was overflowing with water that needed more frequent pumping. WVDEP asked the facility to prevent water build-up in that area. With the increase in temperatures, the interceptor trench is now pumped out once per hour. The facility monitors the trench 24-hours a day.

The facility began excavation of a ditch along Barlow Road. Placement of clay and soils in the northern end of the ditch will raise its elevation so the water drains in a southerly direction away from the facility. The drainage ditch along Barlow Rd will be protected by a silt fence to ensure debris and mud does not impact the flow of water.

Yesterday, the facility completed the transition to a new contractor maintaining the boom. As a precaution, WVDEP contacted WV American Water Company to inform them of the boom operations. No release of MCHM was noted.

The facility continued to load the remaining marketable product into tanker trucks for transport off-site. Approximately 120,000 gallons of various products still need to be removed. The facility received an order for 7,500 gallons of the MCHM/PPH product that is stored at the Poca site. This shipment should empty a single-walled Baker tank. The facility is moving to ensure that all MCHM/PPH at the Poca facility is stored in double-walled tanks.

WVDEP approved shipment of waste water from the Poca facility to Waste Management DSI in Hurricane, WV where the waste water will be treated by solidification. Shipment of this waste water is expected to begin tomorrow. WVDEP requested analytical documentation about the leaching properties of the solidified waste water. The facility's consultants will test the first batch of solidified waste water using the synthetic precipitation leaching procedure (SPLP) method.

An additional 350,000 gallon capacity tank has been cleaned and is on standby onsite as a water storage tank. Two additional 350,000 gallon capacity tanks are also empty, and scheduled to be cleaned and prepared for water storage, if necessary. As of Tuesday, there are approximately 325,000 gallons stored onsite. The facility is planning to remove two 350,000 gallon tanks at the northern end of the facility during the week of March 10, 2014. The facility is completing a draft demolition plan that WVDEP requested include contingency measures to prevent release of any contamination found beneath the tanks.

The facility will continue to collect samples from the interceptor trench on a weekly basis to investigate any trends of MCHM/PPH concentrations in the water, specifically, if flushing action is decreasing the MCHM/PPH concentrations. The facility is also planning to collect water from a seep that is off-site across Barlow Road to look for PPH, as recent data from a monitoring well in the area showed PPH but not MCHM.